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DOC #: \_\_\_\_\_  
DATE FILED: 1/22/20

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January 21, 2020

**APPLICATION GRANTED.** The parties shall file a proposed stipulation of facts and Plaintiff shall file an amended exhibit list no later than January 31, 2020.

Dated: January 22, 2020

New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**VIA ELECTRONIC CASE FILING**

Hon. Lorna G. Schofield, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Cosmopolitan Shipping Company v. Continental Insurance Company  
Civil Action No. 18-CV-3167 (LGS)  
**Request for Brief Extension January 31, 2020 to Submit Proposed  
Stipulation of Facts and Plaintiff's Amended Exhibit List**

Dear Judge Schofield:

This firm represents plaintiff, Cosmopolitan Shipping Company, Inc. (“Cosmopolitan Shipping” or “Plaintiff”) in connection with the above referenced matter. We are writing at this time to respectfully request that the Court briefly extend the time period with which Plaintiff and defendant, Continental Insurance Company are to submit a proposed Stipulation of Facts and Plaintiff is to submit an amended exhibit list pursuant to the Court’s Text Order entered on December 19, 2019 from January 24, 2020 to January 31, 2020. We are hopeful the additional time requested will actually create more efficiency and save the parties and the Court time by our elimination of records custodian witnesses through affidavits that we have been diligently working on, but need a bit more time to allow governmental entities, e.g., United Nations archives, to work through the process. Also, we plan to exchange our proposed Stipulation of Facts this week and the short extension of time would allow for us to more fully confer with Continental’s counsel on these issues. Due to vacations and office closures during the recent winter holidays, it has taken some extra time to connect with the records custodians for purposes of amending the Plaintiff’s exhibit list to comply with the Court’s December 19, 2019 Text Order. Even so, a brief extension of time to submit the proposed Stipulation of Facts and amended exhibit list from January 24, 2020 to January 31, 2020 would afford the parties the necessary time to complete its submission and would not prejudice the parties nor the Court’s schedule or cause any further adjustment to the deadlines and directives set forth within the Court’s December 19, 2019 Text Order, as the next set of submissions to the Court (preparation of witness statements) is not due until February 14, 2020.

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As such, for all of the foregoing reasons, Plaintiff respectfully requests that the Court briefly extend the time period with which to submit the proposed Stipulation of Facts and amended exhibit list to January 31, 2020. We have conveyed this request and circulated this letter to counsel for defendant, Continental Insurance Company in advance of filing with Your Honor. Continental does not object to the brief extension request set forth herein, so long as the extension does not adversely impact Continental's ability to depose Cosmopolitan's records custodians as permitted by Judge Schofield during the December 19, 2019 conference.

Respectfully submitted,

COFFEY & ASSOCIATES

*/s/ Gregory J. Coffey*

Gregory J. Coffey

GJC:

cc: Karen H. Moriarty, Esq. (via ECF)  
Christopher St. Jeanos, Esq. (via ECF)